

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

Ind. # 14 cr. 799 (RA)

NOTICE OF MOTION

v.

VIRGIL FLAVIU GEORGESCU.


Defendant.

PLEASE TAKE NOTICE that on the annexed affirmation of
Albert Y. Dayan, the accompanying Memorandum of Law, the indictment and all
prior papers and proceedings herein, the undersigned will move this Court, at a
time and place to be set by the Court, for the following relief:

- 1) Dismissal of Count One of the indictment on the grounds that
the count does not state an offense, in that, a) the acts charged in
that count are not chargeable under 18 U.S.C. Sec. 1114 and
b) that the crime of reckless murder does not exist;
- 2) That the count does not provide for extraterritorial jurisdiction;
- 3) Discovery.

Dated: July 5, 2015

Yours, etc.,


Albert Y. Dayan
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